

Exhibit F

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2 Including Professional Corporations

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10 SAMSUNG SDI CO., LTD.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 In Re: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Case No. 07-5944-SC

MDL No. 1917

18 This Document Relates to:

19 DELL INC. and DELL PRODUCTS L.P.,

20 Plaintiffs,

21 v.

22 HITACHI, LTD., et al.,

23 Defendants.
24

Individual Case No. 3:13-cv-02171-SC

**SAMSUNG SDI CO., LTD.'S
RESPONSES TO DELL PLAINTIFFS'
FIRST SET OF REQUESTS FOR
ADMISSION**

25 PROPOUNDING PARTIES: DELL INC. and DELL PRODUCTS L.P.

26 RESPONDING PARTY: SAMSUNG SDI CO., LTD.

27 SET NUMBER: One (1)
28

1 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant
2 Samsung SDI Co., Ltd. ("SDI") hereby responds to the First Set of Requests for
3 Admission propounded by Plaintiffs Dell Inc. and Dell Products L.P. (collectively,
4 "Plaintiffs") as follows:

5 I.

6 **GENERAL OBJECTIONS**

7 1. SDI objects to each and every request to the extent it is duplicative or
8 unreasonably cumulative of the voluminous other discovery propounded and/or produced
9 in this multi-district litigation, in violation of Section X.V., par. C-F, of the Court's
10 April 3, 2012 Order re Discovery and Case Management Protocol, including without
11 limitation: SDI's Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories,
12 dated May 12, 2010; SDI's Responses to Direct Purchaser Plaintiffs' First Set of Requests
13 for Production of Documents, dated May 12, 2010; SDI's Responses to Direct Purchaser
14 Plaintiffs' Second Set of Requests for Production of Documents, dated May 12, 2010;
15 SDI's Responses to Indirect Purchaser Plaintiffs' First Set of Requests for Production of
16 Documents, dated May 28, 2010; SDI's Responses to Indirect Purchaser Plaintiffs' Second
17 Set of Requests for Production of Documents, dated May 28, 2010; SDI's Supplemental
18 Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, Nos. 4 and 5, dated
19 October 17, 2011; SDI's Responses to Plaintiff Hawel A. Hawel's Second Set of
20 Interrogatories, dated November 7, 2011; SDI's Responses to Direct Purchaser Plaintiffs'
21 Third Set of Requests for Production of Documents, dated November 7, 2011; SDI's
22 Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 2,
23 dated February 17, 2012; SDI's Responses to certain Direct Action Plaintiffs' First Set of
24 Requests for the Production of Documents, dated August 14, 2013; SDI's responses to
25 Sharp's First Set of Interrogatories, dated October 24, 2013; and SDI's Second
26 Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, Nos. 4
27 and 5, dated November 25, 2013.

28

1 2. SDI objects to the extent that any request, definition, or instruction
2 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
3 more readily available to Plaintiffs from other defendants, third parties, publicly available
4 sources, or otherwise. SDI also objects to every request, definition and instruction to the
5 extent it purports to require SDI to provide information on behalf of persons or entities
6 other than SDI. SDI is incapable of providing information on behalf of other persons and
7 entities, and will respond accordingly.

8 3. SDI objects to each request to the extent it purports to require SDI to
9 ascertain the knowledge, however limited or tangential, of each and every individual
10 employed by SDI at every level of authority or responsibility relating to the subject matter
11 of the request. SDI further objects to each request to the extent it purports to require SDI
12 to provide responsive information with respect to individuals no longer employed by SDI.
13 To the extent that SDI agrees to respond or provides a response herein, that response shall
14 be based on a reasonable search of the files of individuals at SDI reasonably believed to
15 possess information relevant to the claims or defenses of the parties and reasonably
16 calculated to lead to the discovery of admissible evidence.

17 4. SDI and its counsel are continuing their investigation of this matter.
18 SDI's responses are based on information known as of this time. SDI makes these
19 responses without prejudice to its right to supplement or amend them, as necessary, based
20 on subsequently acquired information or knowledge, whether gained through SDI's own
21 continued investigation or the investigation of others.

22 5. SDI objects to each request, definition, or instruction to the extent it
23 seeks information outside the scope of discovery authorized by the Court's September 12,
24 2008, February 5, 2009, June 8, 2009, January 5, 2010, or October 27, 2010 Stay Orders
25 (collectively, the Court's "Discovery Stay Orders").

26 6. SDI objects to Plaintiffs' requests, definitions and instructions to the
27 extent that they seek the discovery of information regarding the sale of CRTs or finished
28 products containing CRTs outside of the United States and unrelated to United States

1 commerce, on the grounds that they are overbroad, unduly burdensome, irrelevant, and not
2 reasonably calculated to lead to the discovery of admissible evidence. Such sales are
3 beyond the scope of this litigation, outside the subject-matter jurisdiction and reach of the
4 antitrust laws of the United States, and beyond the jurisdiction and reach of the laws of any
5 State.

6 7. SDI objects to each request, definition, or instruction to the extent it
7 seeks information regarding conduct outside the applicable statute(s) of limitations, on the
8 grounds that such information is neither relevant to any claims or defenses in this litigation
9 nor reasonably calculated to lead to the discovery of admissible evidence.

10 8. In making these responses, SDI does not concede the relevancy or
11 materiality of any of Plaintiffs' requests; nor does SDI concede the relevancy or
12 materiality of any of the subjects to which those requests relate or refer.

13 9. To the extent any request, definition or instruction may be construed
14 as calling for the disclosure of privileged or immune information, including, without
15 limitation, information subject to the attorney-client privilege, common-interest privilege,
16 work-product doctrine, joint defense privilege, and/or relating to confidential plea or
17 settlement negotiations, and/or any other privilege or immunity from discovery, SDI
18 hereby claims such privileges and immunities and objects to the disclosure of any
19 documents or information subject thereto. Any disclosure of privileged or protected
20 documents, materials, or information is inadvertent and not intended to waive those
21 privileges or protections.

22 10. SDI objects to any request, definition or instruction that calls for the
23 disclosure of information that would violate the legitimate privacy rights and expectations
24 of SDI employees, directors, officers, affiliates or subsidiaries, both current and former, or
25 other individuals, to the extent that such privacy rights or expectations are protected by
26 law, contract, or public policy.

27 11. To the extent any request, definition or instruction may be construed
28 as requiring SDI to characterize documents or their contents or to speculate as to what

documents may or may not show, SDI objects to such request, definition or instruction as vague, ambiguous and calling for legal conclusions and speculation.

12. SDI objects to each and every request, definition and instruction to the extent that it calls for the creation of documents or data compilations that do not exist or that are not ordinarily kept in the normal course of business.

13. SDI objects to each and every request, definition and instruction to the extent it assumes disputed facts or legal conclusions. SDI hereby denies any disputed facts or legal conclusions assumed by each request, definition and instruction. Any response or objection herein is without prejudice to this objection and SDI's right to dispute facts and legal conclusions assumed by the requests, definitions and instructions.

14. SDI objects to each and every request, definition and instruction to the extent that it is overbroad, unduly burdensome and oppressive, and to Plaintiffs' 115 requests as collectively unduly burdensome and oppressive.

II.

OBJECTIONS TO CERTAIN INSTRUCTIONS AND DEFINITIONS

In addition to the foregoing General Objections, SDI objects to certain of Plaintiffs' purported instructions and definitions as follows:

3. Each Request is continuing in nature. If Defendant learns that any Response or production is inaccurate or incomplete, or if a Response or production becomes inaccurate or incomplete by reason of a development occurring after Defendant's initial Response or production, it must promptly supplement each inaccurate or incomplete Response or production by serving supplemental Responses and making a supplemental production in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

Objection: SDI objects that this purported instruction is vague, ambiguous, overbroad, unduly burdensome and oppressive. SDI further objects to this instruction as purporting to impose a greater burden on SDI than is otherwise permissible under the law, including without limitation the Federal Rules of Civil Procedure.

1 4. The term “CDT Conspiracy” as used herein refers to the conspiracy
2 described in Paragraph 4(c) of Samsung SDI’s plea agreement in Case
3 No. 3:11-CR-00162-WHA in United States District Court, Northern District of California
4 (the “Plea Agreement”, Dkt. No. 29) as follows:

5 During the relevant period, the defendant, through its officers
6 and employees, including high-level personnel of the
7 defendant, participated in a conspiracy among major CDT
8 producers, the primary purpose of which was to fix prices,
9 reduce output, and allocate market shares of CDTs sold in the
10 United States and elsewhere. In furtherance of the conspiracy,
11 the defendant, through its officers and employees, engaged in
12 discussions and attended meetings with representatives of other
13 major CDT producers. During these discussions and meetings,
14 agreements were reached to fix prices, reduce output, and
15 allocate market shares of CDTs to be sold in the United States
16 and elsewhere.

12 **Objection:** SDI objects that this purported definition is vague, ambiguous,
13 overbroad, unduly burdensome and oppressive.

14 5. The term “discussions and meetings” as used herein refers to the
15 discussions described in Paragraph 4(c) of Samsung SDI’s plea agreement in Case
16 No. 3:11-CR-00162-WHA in United States District Court, Northern District of California
17 (Dkt. No. 29), which is set forth above.

18 **Objection:** SDI objects that this purported definition is vague, ambiguous,
19 overbroad, unduly burdensome and oppressive.

20 6. Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., Hitachi
21 Asia, Ltd., Hitachi Electronic Devices (USA), Inc., Shenzhen SEG Hitachi Color Display
22 Devices, Ltd., and their officers, agents and employees are referred to collectively as the
23 “Hitachi Companies.”

24 **Objection:** SDI objects that this purported definition is vague, ambiguous,
25 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
26 definition as purporting to impose a greater burden on SDI than is otherwise permissible
27 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
28 incapable of providing information on behalf of persons and entities other than SDI.

1 7. Irico Group Corporation, Irico Group Electronics Co., Ltd., and Irico
2 Display Devices Co., Ltd. are referred to collectively as the "Irico Companies."

3 **Objection:** SDI objects that this purported definition is vague, ambiguous,
4 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
5 definition as purporting to impose a greater burden on SDI than is otherwise permissible
6 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
7 incapable of providing information on behalf of persons and entities other than SDI.

8 8. LG Display Co., Ltd. (formerly known as LG Philips LCD Co., Ltd.),
9 LG Display America, Inc. (formerly known as LG Philips LCD America, Inc.), LG
10 Electronics, Inc. LG Electronics USA, Inc., and their officers, agents and employees are
11 referred to collectively herein as the "LG Companies."

12 **Objection:** SDI objects that this purported definition is vague, ambiguous,
13 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
14 definition as purporting to impose a greater burden on SDI than is otherwise permissible
15 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
16 incapable of providing information on behalf of persons and entities other than SDI.

17 9. Mitsubishi Electric Corporation, Mitsubishi Digital Electronics
18 America, Inc., Mitsubishi Electric & Electronics, USA, Inc., and their officers, agents and
19 employees are referred to collectively as the "Mitsubishi Companies."

20 **Objection:** SDI objects that this purported definition is vague, ambiguous,
21 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
22 definition as purporting to impose a greater burden on SDI than is otherwise permissible
23 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
24 incapable of providing information on behalf of persons and entities other than SDI.

25 10. Koninklijke Philips Electronics N.V., Philips Electronics North
26 America Corporation, Philips Electronics Industries (Taiwan), Ltd., Philips Da Amazonia
27 Industria Electronica LTDA, and their officers, agents and employees are referred to
28 collectively as the "Philips Companies."

1 **Objection:** SDI objects that this purported definition is vague, ambiguous,
2 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
3 definition as purporting to impose a greater burden on SDI than is otherwise permissible
4 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
5 incapable of providing information on behalf of persons and entities other than SDI.

6 11. Technicolor SA, Thompson SA, Technicolor USA, Inc., Thompson
7 Consumer Electronics, Inc., and their officers, agents and employees are referred to
8 collectively as the “Thompson Companies.”

9 **Objection:** SDI objects that this purported definition is vague, ambiguous,
10 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
11 definition as purporting to impose a greater burden on SDI than is otherwise permissible
12 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
13 incapable of providing information on behalf of persons and entities other than SDI.

14 12. Toshiba Corporation, Toshiba America Consumer Products, LLC,
15 Toshiba America Electronic Components, Inc., Toshiba Display Devices (Thailand) Co.,
16 Ltd., Toshiba America Information Systems, Inc., and their officers, agents and employees
17 are referred to collectively as the “Toshiba Companies.”

18 **Objection:** SDI objects that this purported definition is vague, ambiguous,
19 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
20 definition as purporting to impose a greater burden on SDI than is otherwise permissible
21 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
22 incapable of providing information on behalf of persons and entities other than SDI.

23 13. Chunghwa Picture Tubes, Ltd., Chunghwa Picture Tubes (Malaysia)
24 Sdn. Bhd., and their officers, agents and employees are referred to collectively as the
25 “Chunghwa Companies.”

26 **Objection:** SDI objects that this purported definition is vague, ambiguous,
27 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
28 definition as purporting to impose a greater burden on SDI than is otherwise permissible

1 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
2 incapable of providing information on behalf of persons and entities other than SDI.

3 14. Orion Electronic Co., Daewoo Electronics Co., Ltd., Daewoo-Orion
4 Société Anonyme, and their officers, agents and employees are referred to collectively as
5 the "Orion Companies."

6 **Objection:** SDI objects that this purported definition is vague, ambiguous,
7 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
8 definition as purporting to impose a greater burden on SDI than is otherwise permissible
9 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
10 incapable of providing information on behalf of persons and entities other than SDI.

11 15. Thai CRT Company and its officers, agents and employees are
12 referred to collectively as the "Thai CRT Co."

13 **Objection:** SDI objects that this purported definition is vague, ambiguous,
14 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
15 definition as purporting to impose a greater burden on SDI than is otherwise permissible
16 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
17 incapable of providing information on behalf of persons and entities other than SDI.

18 16. P.T. Tosummit Electronic Devices Indonesia and its officers, agents
19 and employees are referred to collectively as "P.T. Tosummit Electronic Devices
20 Indonesia."

21 **Objection:** SDI objects that this purported definition is vague, ambiguous,
22 overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this
23 definition as purporting to impose a greater burden on SDI than is otherwise permissible
24 under the law, including without limitation the Federal Rules of Civil Procedure. SDI is
25 incapable of providing information on behalf of persons and entities other than SDI.

26 17. LP Displays International, Ltd. and its officers, agents and employees
27 are referred to collectively as "LP Displays Int'l, Ltd."

28

Objection: SDI objects that this purported definition is vague, ambiguous, overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this definition as purporting to impose a greater burden on SDI than is otherwise permissible under the law, including without limitation the Federal Rules of Civil Procedure. SDI is incapable of providing information on behalf of persons and entities other than SDI.

18. Samtel Color, Ltd. and its officers, agents and employees are referred to collectively as "Samtel Color Ltd."

Objection: SDI objects that this purported definition is vague, ambiguous, overbroad, unintelligible, unduly burdensome and oppressive. SDI further objects to this definition as purporting to impose a greater burden on SDI than is otherwise permissible under the law, including without limitation the Federal Rules of Civil Procedure. SDI is incapable of providing information on behalf of persons and entities other than SDI.

19. As set forth in Paragraph 4(a) of Defendant's Plea Agreement, and for purposes of this discovery, the "Relevant Period" is that period from at least as early as January 1997, until at least as late as March 2006.

Objection: SDI objects to this purported definition to the extent it calls for information regarding conduct outside the applicable statute(s) of limitations on the grounds that it is overbroad, unduly burdensome, oppressive and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. SDI further objects to this definition to the extent it purports to impose a greater burden on SDI than is otherwise permissible under the law, including without limitation the Federal Rules of Civil Procedure.

III.

RESPONSES TO REQUESTS FOR ADMISSION

Subject to the foregoing General Objections and Objections to Certain Instructions and Definitions, SDI hereby responds to Plaintiffs' individual requests for admission as follows:

1 **REQUEST FOR ADMISSION NO. 1:**

2 As set forth in paragraph 4(b) of your Plea Agreement, admit that CDTs are
3 a type of cathode ray tube manufactured for use in computer monitors.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

5 In addition to its General Objections and Objections to Certain Instructions
6 and Definitions, each of which is incorporated by this reference as though fully set forth
7 herein, SDI objects to this request to the extent it seeks information in the possession,
8 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
9 from other defendants, third parties or otherwise. SDI also objects to this request on the
10 grounds that it is vague and ambiguous.

11 Subject to and without waiver of the foregoing objections, and based on
12 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
13 SDI responds as follows: SDI admits that color display tubes ("CDTs") are a type of
14 cathode ray tube that may be used in computer monitors and other products.

15 **REQUEST FOR ADMISSION NO. 2:**

16 As set forth in paragraph 4(a) of your Plea Agreement, admit that during the
17 Relevant Period, Samsung SDI was a producer of CDTs.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

19 In addition to its General Objections and Objections to Certain Instructions
20 and Definitions, each of which is incorporated by this reference as though fully set forth
21 herein, SDI objects to this request on the grounds that it is vague, ambiguous, overbroad,
22 and seeks information that is neither relevant to any claims or defenses in this litigation nor
23 reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: SDI admits that it manufactured color display tubes during at
27 least portions of the time period January 1997 through March 2006.

28

1 **REQUEST FOR ADMISSION NO. 3:**

2 As set forth in paragraph 4(a) of your Plea Agreement, admit that during the
3 Relevant Period, Samsung SDI was engaged in the sale of CDTs in the United States and
4 elsewhere.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague, ambiguous, overbroad,
9 and seeks information that is neither relevant to any claims or defenses in this litigation nor
10 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
11 to this request to the extent it assumes disputed facts or legal conclusions, and/or to the
12 extent it purports to require SDI to draw legal conclusions.

13 Subject to and without waiver of the foregoing objections, and based on
14 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
15 SDI responds as follows: SDI admits that it sold color display tubes in the United States
16 and elsewhere during at least portions of the time period January 1997 through March
17 2006.

18 **REQUEST FOR ADMISSION NO. 4:**

19 As set forth in paragraph 4(d) of your Plea Agreement, admit that during the
20 Relevant Period, Samsung SDI's CDT sales to customers in the United States totaled
21 approximately \$89 million.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

23 In addition to its General Objections and Objections to Certain Instructions
24 and Definitions, each of which is incorporated by this reference as though fully set forth
25 herein, SDI objects to this request to the extent that it seeks privileged or immune
26 information, including without limitation documents or information subject to the attorney-
27 client privilege, common-interest privilege, work-product doctrine, joint defense privilege,
28 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or

1 immunity. SDI also objects to this request to the extent it seeks information in the
2 possession, custody or control of Plaintiffs, or that are equally or more readily available to
3 Plaintiffs from other defendants, third parties or otherwise, particularly to the extent it
4 seeks documents or information regarding persons or entities other than SDI. SDI further
5 objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to
6 the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any
7 such disputed facts or legal conclusions. SDI also objects to this request on the grounds
8 that it is vague and ambiguous, including without limitation as to the term "customers in
9 the United States" as used in this request.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: SDI admits that the "volume of commerce" figure used in
13 calculating SDI's sentence under the U.S. Sentencing Guidelines, pursuant to SDI's
14 May 12, 2011 Amended Plea Agreement with the U.S. Department of Justice (the "Plea
15 Agreement"), was \$89 million. SDI otherwise denies this request.

16 **REQUEST FOR ADMISSION NO. 5:**

17 As set forth in paragraph 4(c) of your Plea Agreement, admit that during the
18 Relevant Period, Samsung SDI, through its officers and employees, including high-level
19 personnel, participated in a conspiracy among major CDT producers, the primary purpose
20 of which was to fix prices, reduce output, and allocate market shares of CDTs sold in the
21 United States and elsewhere.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

23 In addition to its General Objections and Objections to Certain Instructions
24 and Definitions, each of which is incorporated by this reference as though fully set forth
25 herein, SDI objects to this request to the extent that it seeks privileged or immune
26 information, including without limitation documents or information subject to the attorney-
27 client privilege, common-interest privilege, work-product doctrine, joint defense privilege,
28 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or

1 immunity. SDI further objects to this request to the extent it assumes disputed facts or
2 legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions,
3 and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to
4 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
5 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
6 to lead to the discovery of admissible evidence.

7 Subject to and without waiver of the foregoing objections, and based on
8 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
9 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
10 in its Plea Agreement.

11 **REQUEST FOR ADMISSION NO. 6:**

12 As set forth in paragraph 4(e) of your Plea Agreement, admit that acts in
13 furtherance of the CDT Conspiracy were carried out within the Northern District of
14 California.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

16 In addition to its General Objections and Objections to Certain Instructions
17 and Definitions, each of which is incorporated by this reference as though fully set forth
18 herein, SDI objects to this request to the extent that it seeks privileged or immune
19 information, including without limitation documents or information subject to the attorney-
20 client privilege, common-interest privilege, work-product doctrine, joint defense privilege,
21 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or
22 immunity. SDI further objects to this request to the extent it assumes disputed facts or
23 legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions,
24 and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to
25 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
26 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
27 to lead to the discovery of admissible evidence.

28

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Admitted.

4 **REQUEST FOR ADMISSION NO. 7:**

5 As set forth in paragraph 4(e) of your Plea Agreement, admit that the CDTs
6 that were the subject of the CDT Conspiracy were transported by one or more of the
7 conspirators through the Northern District of California.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request to the extent that it seeks privileged or immune
12 information, including without limitation documents or information subject to the attorney-
13 client privilege, common-interest privilege, work-product doctrine, joint defense privilege,
14 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or
15 immunity. SDI further objects to this request to the extent it assumes disputed facts or
16 legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions,
17 and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to
18 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
19 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
20 to lead to the discovery of admissible evidence.

21 Subject to and without waiver of the foregoing objections, and based on
22 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
23 SDI responds as follows: Admitted.

24 **REQUEST FOR ADMISSION NO. 8:**

25 As set forth in paragraph 4(c) of your Plea Agreement, admit that in
26 furtherance of the CDT Conspiracy, Samsung SDI, through its officers and employees,
27 engaged in discussions and attended meetings with representatives of other major CDT
28 producers.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent that it seeks privileged or immune information, including without limitation documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or relating to confidential plea or settlement negotiations, and/or any other privilege or immunity. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is vague, ambiguous, overbroad, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI's present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: SDI admits that it participated in the CDT conspiracy described in its Plea Agreement.

REQUEST FOR ADMISSION NO. 9:

As set forth in paragraph 4(c) of your Plea Agreement, admit that during discussions and meetings with major CDT producers, agreements were reached to fix prices, reduce output, and allocate market shares of CDTs to be sold in the United States and elsewhere.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent that it seeks privileged or immune information, including without limitation documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege,

1 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or
2 immunity. SDI further objects to this request to the extent it assumes disputed facts or
3 legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions,
4 and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to
5 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
6 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
7 to lead to the discovery of admissible evidence.

8 Subject to and without waiver of the foregoing objections, and based on
9 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
10 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
11 in its Plea Agreement.

12 **REQUEST FOR ADMISSION NO. 10:**

13 As set forth in paragraph 4(d) of your Plea Agreement, admit that the
14 business activities of Samsung SDI in connection with the production and sales of CDTs
15 that were the subject of the CDT Conspiracy were within the flow of, and substantially
16 affected, interstate and foreign trade and commerce.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request to the extent that it seeks privileged or immune
21 information, including without limitation documents or information subject to the attorney-
22 client privilege, common-interest privilege, work-product doctrine, joint defense privilege,
23 and/or relating to confidential plea or settlement negotiations, and/or any other privilege or
24 immunity. SDI further objects to this request to the extent it assumes disputed facts or
25 legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions,
26 and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to
27 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
28

1 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
2 to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Admitted.

6 **REQUEST FOR ADMISSION NO. 11:**

7 Admit that Dell purchased monitors containing CDTs manufactured by
8 Samsung SDI during the Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request to the extent it seeks information in the possession,
13 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
14 from other defendants, third parties or otherwise, particularly to the extent it seeks
15 documents or information regarding persons or entities other than SDI. SDI also objects to
16 this request on the grounds that it is vague, ambiguous, overbroad, and seeks information
17 that is neither relevant to any claims or defenses in this litigation nor reasonably calculated
18 to lead to the discovery of admissible evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds that it presently lacks sufficient information to admit or deny this request as
22 framed.

23 **REQUEST FOR ADMISSION NO. 12:**

24 Admit that officers and employees of Samsung SDI engaged in discussions
25 and attended meetings with representatives of at least one of the Hitachi Companies during
26 the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and [] meetings” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 13:

Admit that officers and employees of Samsung SDI exchanged CDT pricing information with at least one of the Hitachi Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “pricing information” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI

1 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
2 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
3 information that is neither relevant to any claims or defenses in this litigation nor
4 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
5 to this request on the grounds that it is duplicative and unreasonably cumulative of other
6 discovery propounded and responded to in this multi-district litigation, in violation of
7 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
8 Management Protocol, and is therefore unduly burdensome and oppressive.

9 **REQUEST FOR ADMISSION NO. 14:**

10 Admit that officers and employees of Samsung SDI participated in a
11 conspiracy to fix prices of CDTs with at least one of the Hitachi Companies during the
12 Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
18 also objects to this request to the extent it seeks information in the possession, custody or
19 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
20 defendants, third parties or otherwise. SDI further objects to this request to the extent it
21 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
22 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
23 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
24 information that is neither relevant to any claims or defenses in this litigation nor
25 reasonably calculated to lead to the discovery of admissible evidence.

26 Subject to and without waiver of the foregoing objections, and based on
27 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
28 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to reduce output of CDTs with at least one of the Hitachi Companies during the
4 Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
10 also objects to this request to the extent it seeks information in the possession, custody or
11 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
12 defendants, third parties or otherwise. SDI further objects to this request to the extent it
13 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
14 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
15 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
16 information that is neither relevant to any claims or defenses in this litigation nor
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiver of the foregoing objections, and based on
19 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
20 SDI responds as follows: Denied.

21 **REQUEST FOR ADMISSION NO. 16:**

22 Admit that officers and employees of Samsung SDI participated in a
23 conspiracy to allocate market shares of CDTs with at least one of the Hitachi Companies
24 during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 17:**

14 Admit that during discussions and meetings with at least one of the Hitachi
15 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
16 CDTs during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the purportedly defined term "discussions and meetings" and the
22 term "agreements" as used in this request. SDI also objects to this request to the extent it
23 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
24 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
25 further objects to this request to the extent it assumes disputed facts or legal conclusions,
26 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
27 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
28 grounds that it is overbroad and seeks information that is neither relevant to any claims or

1 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 18:**

7 Admit that during discussions and meetings with at least one of the Hitachi
8 Companies, officers and employees of Samsung SDI reached agreements to reduce output
9 of CDTs during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the purportedly defined term "discussions and meetings" and the
15 term "agreements" as used in this request. SDI also objects to this request to the extent it
16 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
17 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
18 further objects to this request to the extent it assumes disputed facts or legal conclusions,
19 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
20 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
21 grounds that it is overbroad and seeks information that is neither relevant to any claims or
22 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 19:**

2 Admit that during discussions and meetings with at least one of the Hitachi
3 Companies, officers and employees of Samsung SDI reached agreements to allocate
4 market shares of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term "discussions and meetings" and the
10 term "agreements" as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 20:**

23 Admit that officers and employees of Samsung SDI engaged in discussions
24 and attended meetings with at least one of the Irico Companies during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the purportedly defined term “discussions and [] meetings” as used
2 in this request. SDI also objects to this request to the extent it seeks information in the
3 possession, custody or control of Plaintiffs, or that are equally or more readily available to
4 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
5 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
6 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
7 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
8 is overbroad and seeks information that is neither relevant to any claims or defenses in this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that officers and employees of Samsung SDI exchanged CDT pricing
15 information with at least one of the Irico Companies during the Relevant Period.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

17 In addition to its General Objections and Objections to Certain Instructions
18 and Definitions, each of which is incorporated by this reference as though fully set forth
19 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
20 without limitation as to the term “pricing information” as used in this request. SDI also
21 objects to this request to the extent it seeks information in the possession, custody or
22 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
23 defendants, third parties or otherwise. SDI further objects to this request to the extent it
24 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
25 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
26 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
27 information that is neither relevant to any claims or defenses in this litigation nor
28 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects

1 to this request on the grounds that it is duplicative and unreasonably cumulative of other
2 discovery propounded and responded to in this multi-district litigation, in violation of
3 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
4 Management Protocol, and is therefore unduly burdensome and oppressive.

5 **REQUEST FOR ADMISSION NO. 22:**

6 Admit that officers and employees of Samsung SDI participated in a
7 conspiracy to fix prices of CDTs with at least one of the Irico Companies during the
8 Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
13 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
14 also objects to this request to the extent it seeks information in the possession, custody or
15 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
16 defendants, third parties or otherwise. SDI further objects to this request to the extent it
17 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
18 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
19 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
20 information that is neither relevant to any claims or defenses in this litigation nor
21 reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that officers and employees of Samsung SDI participated in a
27 conspiracy to reduce output of CDTs with at least one of the Irico Companies during the
28 Relevant Period.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

2 In addition to its General Objections and Objections to Certain Instructions
3 and Definitions, each of which is incorporated by this reference as though fully set forth
4 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
5 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
6 also objects to this request to the extent it seeks information in the possession, custody or
7 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
8 defendants, third parties or otherwise. SDI further objects to this request to the extent it
9 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
10 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
11 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
12 information that is neither relevant to any claims or defenses in this litigation nor
13 reasonably calculated to lead to the discovery of admissible evidence.

14 Subject to and without waiver of the foregoing objections, and based on
15 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
16 SDI responds as follows: Denied.

17 **REQUEST FOR ADMISSION NO. 24:**

18 Admit that officers and employees of Samsung SDI participated in a
19 conspiracy to allocate market shares of CDTs with at least one of the Irico Companies
20 during the Relevant Period.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

22 In addition to its General Objections and Objections to Certain Instructions
23 and Definitions, each of which is incorporated by this reference as though fully set forth
24 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
25 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
26 also objects to this request to the extent it seeks information in the possession, custody or
27 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
28 defendants, third parties or otherwise. SDI further objects to this request to the extent it

1 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
2 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
3 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
4 information that is neither relevant to any claims or defenses in this litigation nor
5 reasonably calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: Denied.

9 **REQUEST FOR ADMISSION NO. 25:**

10 Admit that during discussions and meetings with at least one of the Irico
11 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
12 CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and meetings" and the
18 term "agreements" as used in this request. SDI also objects to this request to the extent it
19 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
20 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
21 further objects to this request to the extent it assumes disputed facts or legal conclusions,
22 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
23 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
24 grounds that it is overbroad and seeks information that is neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 26:**

5 Admit that during discussions and meetings with at least one of the Irico
6 Companies, officers and employees of Samsung SDI reached agreements to reduce output
7 of CDTs during the Relevant Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the purportedly defined term "discussions and meetings" and the
13 term "agreements" as used in this request. SDI also objects to this request to the extent it
14 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
15 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
16 further objects to this request to the extent it assumes disputed facts or legal conclusions,
17 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
18 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
19 grounds that it is overbroad and seeks information that is neither relevant to any claims or
20 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 27:**

26 Admit that during discussions and meetings with at least one of the Irico
27 Companies, officers and employees of Samsung SDI reached agreements to allocate
28 market shares of CDTs during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and meetings” and the term “agreements” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 28:

Admit that officers and employees of Samsung SDI engaged in discussions and attended meetings with representatives of at least one of the LG Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and [] meetings” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to

1 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
2 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
3 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
4 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
5 is overbroad and seeks information that is neither relevant to any claims or defenses in this
6 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to and without waiver of the foregoing objections, and based on
8 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
9 SDI responds as follows: Denied.

10 **REQUEST FOR ADMISSION NO. 29:**

11 Admit that officers and employees of Samsung SDI exchanged CDT pricing
12 information with at least one of the LG Companies during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the term "pricing information" as used in this request. SDI also
18 objects to this request to the extent it seeks information in the possession, custody or
19 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
20 defendants, third parties or otherwise. SDI further objects to this request to the extent it
21 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
22 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
23 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
24 information that is neither relevant to any claims or defenses in this litigation nor
25 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
26 to this request on the grounds that it is duplicative and unreasonably cumulative of other
27 discovery propounded and responded to in this multi-district litigation, in violation of

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1 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
2 Management Protocol, and is therefore unduly burdensome and oppressive.

3 **REQUEST FOR ADMISSION NO. 30:**

4 Admit that officers and employees of Samsung SDI participated in a
5 conspiracy to fix prices of CDTs with at least one of the LG Companies during the
6 Relevant Period.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

8 In addition to its General Objections and Objections to Certain Instructions
9 and Definitions, each of which is incorporated by this reference as though fully set forth
10 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
11 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
12 also objects to this request to the extent it seeks information in the possession, custody or
13 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
14 defendants, third parties or otherwise. SDI further objects to this request to the extent it
15 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
16 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
17 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
18 information that is neither relevant to any claims or defenses in this litigation nor
19 reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiver of the foregoing objections, and based on
21 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
22 SDI responds as follows: Denied.

23 **REQUEST FOR ADMISSION NO. 31:**

24 Admit that officers and employees of Samsung SDI participated in a
25 conspiracy to reduce output of CDTs with at least one of the LG Companies during the
26 Relevant Period.

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RESPONSE TO REQUEST FOR ADMISSION NO. 31:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 32:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the LG Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it

1 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
2 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
3 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
4 information that is neither relevant to any claims or defenses in this litigation nor
5 reasonably calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: Denied.

9 **REQUEST FOR ADMISSION NO. 33:**

10 Admit that during discussions and meetings with at least one of the LG
11 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
12 CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and meetings" and the
18 term "agreements" as used in this request. SDI also objects to this request to the extent it
19 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
20 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
21 further objects to this request to the extent it assumes disputed facts or legal conclusions,
22 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
23 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
24 grounds that it is overbroad and seeks information that is neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 34:**

5 Admit that during discussions and meetings with at least one of the LG
6 Companies, officers and employees of Samsung SDI reached agreements to reduce output
7 of CDTs during the Relevant Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the purportedly defined term "discussions and meetings" and the
13 term "agreements" as used in this request. SDI also objects to this request to the extent it
14 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
15 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
16 further objects to this request to the extent it assumes disputed facts or legal conclusions,
17 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
18 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
19 grounds that it is overbroad and seeks information that is neither relevant to any claims or
20 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 35:**

26 Admit that during discussions and meetings with at least one of the LG
27 Companies, officers and employees of Samsung SDI reached agreements to allocate
28 market shares of CDTs during the Relevant Period.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

2 In addition to its General Objections and Objections to Certain Instructions
3 and Definitions, each of which is incorporated by this reference as though fully set forth
4 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
5 without limitation as to the purportedly defined term "discussions and meetings" and the
6 term "agreements" as used in this request. SDI also objects to this request to the extent it
7 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
8 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
9 further objects to this request to the extent it assumes disputed facts or legal conclusions,
10 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
11 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
12 grounds that it is overbroad and seeks information that is neither relevant to any claims or
13 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
14 evidence.

15 Subject to and without waiver of the foregoing objections, and based on
16 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
17 SDI responds as follows: Denied.

18 **REQUEST FOR ADMISSION NO. 36:**

19 Admit that officers and employees of Samsung SDI engaged in discussions
20 and attended meetings with at least one of the Mitsubishi Companies during the Relevant
21 Period.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

23 In addition to its General Objections and Objections to Certain Instructions
24 and Definitions, each of which is incorporated by this reference as though fully set forth
25 herein, SDI objects to this request to the extent it seeks information in the possession,
26 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
27 from other defendants, third parties or otherwise. SDI further objects to this request to the
28 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to

1 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
2 legal conclusions. SDI also objects to this request on the grounds that it is vague and
3 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
4 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: SDI admits that it engaged in discussions and attended meetings
9 as described in its Plea Agreement with individuals who SDI understood to be
10 representatives of at least one Mitsubishi entity.

11 **REQUEST FOR ADMISSION NO. 37:**

12 Admit that officers and employees of Samsung SDI exchanged CDT pricing
13 information with at least one of the Mitsubishi Companies during the Relevant Period.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

15 In addition to its General Objections and Objections to Certain Instructions
16 and Definitions, each of which is incorporated by this reference as though fully set forth
17 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
18 without limitation as to the term "pricing information" as used in this request. SDI also
19 objects to this request to the extent it seeks information in the possession, custody or
20 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
21 defendants, third parties or otherwise. SDI further objects to this request to the extent it
22 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
23 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
24 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
25 information that is neither relevant to any claims or defenses in this litigation nor
26 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
27 to this request on the grounds that it is duplicative and unreasonably cumulative of other
28 discovery propounded and responded to in this multi-district litigation, in violation of

1 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
2 Management Protocol, and is therefore unduly burdensome and oppressive.

3 **REQUEST FOR ADMISSION NO. 38:**

4 Admit that officers and employees of Samsung SDI participated in a
5 conspiracy to fix prices of CDTs with at least one of the Mitsubishi Companies during the
6 Relevant Period.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

8 In addition to its General Objections and Objections to Certain Instructions
9 and Definitions, each of which is incorporated by this reference as though fully set forth
10 herein, SDI objects to this request to the extent it seeks information in the possession,
11 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
12 from other defendants, third parties or otherwise. SDI further objects to this request to the
13 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
14 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
15 legal conclusions. SDI also objects to this request on the grounds that it is vague and
16 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
22 in its Plea Agreement with at least one Mitsubishi entity.

23 **REQUEST FOR ADMISSION NO. 39:**

24 Admit that officers and employees of Samsung SDI participated in a
25 conspiracy to reduce output of CDTs with at least one of the Mitsubishi Companies during
26 the Relevant Period.

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28

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is vague and ambiguous, overbroad, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI's present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: SDI admits that it participated in the CDT conspiracy described in its Plea Agreement with at least one Mitsubishi entity.

REQUEST FOR ADMISSION NO. 40:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the Mitsubishi Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or

1 legal conclusions. SDI also objects to this request on the grounds that it is vague and
2 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
8 in its Plea Agreement with at least one Mitsubishi entity.

9 **REQUEST FOR ADMISSION NO. 41:**

10 Admit that during discussions and meetings with at least one of the
11 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to fix
12 prices of CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request to the extent it seeks information in the possession,
17 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
18 from other defendants, third parties or otherwise. SDI further objects to this request to the
19 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
20 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
21 legal conclusions. SDI also objects to this request on the grounds that it is vague and
22 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
23 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Subject to and without waiver of the foregoing objections, and based on
26 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
27 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
28 in its Plea Agreement with at least one Mitsubishi entity.

1 **REQUEST FOR ADMISSION NO. 42:**

2 Admit that during discussions and meetings with at least one of the
3 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to
4 reduce output of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request to the extent it seeks information in the possession,
9 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
10 from other defendants, third parties or otherwise. SDI further objects to this request to the
11 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
12 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
13 legal conclusions. SDI also objects to this request on the grounds that it is vague and
14 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
15 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiver of the foregoing objections, and based on
18 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
19 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
20 in its Plea Agreement with at least one Mitsubishi entity.

21 **REQUEST FOR ADMISSION NO. 43:**

22 Admit that during discussions and meetings with at least one of the
23 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to
24 allocate market shares of CDTs during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request to the extent it seeks information in the possession,

1 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
2 from other defendants, third parties or otherwise. SDI further objects to this request to the
3 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
4 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
5 legal conclusions. SDI also objects to this request on the grounds that it is vague and
6 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
7 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiver of the foregoing objections, and based on
10 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
11 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
12 in its Plea Agreement with at least one Mitsubishi entity.

13 **REQUEST FOR ADMISSION NO. 44:**

14 Admit that officers and employees of Samsung SDI engaged in discussions
15 and attended meetings with at least one of the Philips Companies during the Relevant
16 Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the purportedly defined term "discussions and [] meetings" as used
22 in this request. SDI also objects to this request to the extent it seeks information in the
23 possession, custody or control of Plaintiffs, or that are equally or more readily available to
24 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
25 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
26 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
27 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
28

1 is overbroad and seeks information that is neither relevant to any claims or defenses in this
2 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 45:**

7 Admit that officers and employees of Samsung SDI exchanged CDT pricing
8 information with at least one of the Philips Companies during the Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
13 without limitation as to the term "pricing information" as used in this request. SDI also
14 objects to this request to the extent it seeks information in the possession, custody or
15 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
16 defendants, third parties or otherwise. SDI further objects to this request to the extent it
17 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
18 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
19 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
20 information that is neither relevant to any claims or defenses in this litigation nor
21 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
22 to this request on the grounds that it is duplicative and unreasonably cumulative of other
23 discovery propounded and responded to in this multi-district litigation, in violation of
24 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
25 Management Protocol, and is therefore unduly burdensome and oppressive.

1 **REQUEST FOR ADMISSION NO. 46:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to fix prices of CDTs with at least one of the Philips Companies during the
4 Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
10 also objects to this request to the extent it seeks information in the possession, custody or
11 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
12 defendants, third parties or otherwise. SDI further objects to this request to the extent it
13 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
14 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
15 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
16 information that is neither relevant to any claims or defenses in this litigation nor
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiver of the foregoing objections, and based on
19 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
20 SDI responds as follows: Denied.

21 **REQUEST FOR ADMISSION NO. 47:**

22 Admit that officers and employees of Samsung SDI participated in a
23 conspiracy to reduce output of CDTs with at least one of the Philips Companies during the
24 Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 48:**

14 Admit that officers and employees of Samsung SDI participated in a
15 conspiracy to allocate market shares of CDTs with at least one of the Philips Companies
16 during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
22 also objects to this request to the extent it seeks information in the possession, custody or
23 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
24 defendants, third parties or otherwise. SDI further objects to this request to the extent it
25 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
26 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
27 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
28

1 information that is neither relevant to any claims or defenses in this litigation nor
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 49:**

7 Admit that during discussions and meetings with at least one of the Philips
8 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
9 CDTs during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the purportedly defined term "discussions and meetings" and the
15 term "agreements" as used in this request. SDI also objects to this request to the extent it
16 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
17 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
18 further objects to this request to the extent it assumes disputed facts or legal conclusions,
19 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
20 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
21 grounds that it is overbroad and seeks information that is neither relevant to any claims or
22 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 50:**

2 Admit that during discussions and meetings with at least one of the Philips
3 Companies, officers and employees of Samsung SDI reached agreements to reduce output
4 of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term "discussions and meetings" and the
10 term "agreements" as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 51:**

23 Admit that during discussions and meetings with at least one of the Philips
24 Companies, officers and employees of Samsung SDI reached agreements to allocate
25 market shares of CDTs during the Relevant Period.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

27 In addition to its General Objections and Objections to Certain Instructions
28 and Definitions, each of which is incorporated by this reference as though fully set forth

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the purportedly defined term “discussions and meetings” and the
3 term “agreements” as used in this request. SDI also objects to this request to the extent it
4 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
5 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
6 further objects to this request to the extent it assumes disputed facts or legal conclusions,
7 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
8 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
9 grounds that it is overbroad and seeks information that is neither relevant to any claims or
10 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiver of the foregoing objections, and based on
13 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
14 SDI responds as follows: Denied.

15 **REQUEST FOR ADMISSION NO. 52:**

16 Admit that officers and employees of Samsung SDI engaged in discussions
17 and attended meetings with at least one of the Thompson Companies during the Relevant
18 Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
23 without limitation as to the purportedly defined term “discussions and [] meetings” as used
24 in this request. SDI also objects to this request to the extent it seeks information in the
25 possession, custody or control of Plaintiffs, or that are equally or more readily available to
26 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
27 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
28 purports to require SDI to draw legal conclusions, and SDI hereby denies any such

1 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
2 is overbroad and seeks information that is neither relevant to any claims or defenses in this
3 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiver of the foregoing objections, and based on
5 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
6 SDI responds as follows: Denied.

7 **REQUEST FOR ADMISSION NO. 53:**

8 Admit that officers and employees of Samsung SDI exchanged CDT pricing
9 information with at least one of the Thompson Companies during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the term "pricing information" as used in this request. SDI also
15 objects to this request to the extent it seeks information in the possession, custody or
16 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
17 defendants, third parties or otherwise. SDI further objects to this request to the extent it
18 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
19 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
20 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
21 information that is neither relevant to any claims or defenses in this litigation nor
22 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
23 to this request on the grounds that it is duplicative and unreasonably cumulative of other
24 discovery propounded and responded to in this multi-district litigation, in violation of
25 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
26 Management Protocol, and is therefore unduly burdensome and oppressive.

1 **REQUEST FOR ADMISSION NO. 54:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to fix prices of CDTs with at least one of the Thompson Companies during the
4 Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
10 also objects to this request to the extent it seeks information in the possession, custody or
11 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
12 defendants, third parties or otherwise. SDI further objects to this request to the extent it
13 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
14 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
15 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
16 information that is neither relevant to any claims or defenses in this litigation nor
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiver of the foregoing objections, and based on
19 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
20 SDI responds as follows: Denied.

21 **REQUEST FOR ADMISSION NO. 55:**

22 Admit that officers and employees of Samsung SDI participated in a
23 conspiracy to reduce output of CDTs with at least one of the Thompson Companies during
24 the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 56:**

14 Admit that officers and employees of Samsung SDI participated in a
15 conspiracy to allocate market shares of CDTs with at least one of the Thompson
16 Companies during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
22 also objects to this request to the extent it seeks information in the possession, custody or
23 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
24 defendants, third parties or otherwise. SDI further objects to this request to the extent it
25 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
26 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
27 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
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1 information that is neither relevant to any claims or defenses in this litigation nor
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 57:**

7 Admit that during discussions and meetings with at least one of the
8 Thompson Companies, officers and employees of Samsung SDI reached agreements to fix
9 prices of CDTs during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the purportedly defined term "discussions and meetings" and the
15 term "agreements" as used in this request. SDI also objects to this request to the extent it
16 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
17 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
18 further objects to this request to the extent it assumes disputed facts or legal conclusions,
19 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
20 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
21 grounds that it is overbroad and seeks information that is neither relevant to any claims or
22 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: Denied.

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1 **REQUEST FOR ADMISSION NO. 58:**

2 Admit that during discussions and meetings with at least one of the
3 Thompson Companies, officers and employees of Samsung SDI reached agreements to
4 reduce output of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term “discussions and meetings” and the
10 term “agreements” as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 59:**

23 Admit that during discussions and meetings with at least one of the
24 Thompson Companies, officers and employees of Samsung SDI reached agreements to
25 allocate market shares of CDTs during the Relevant Period.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

27 In addition to its General Objections and Objections to Certain Instructions
28 and Definitions, each of which is incorporated by this reference as though fully set forth

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the purportedly defined term “discussions and meetings” and the
3 term “agreements” as used in this request. SDI also objects to this request to the extent it
4 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
5 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
6 further objects to this request to the extent it assumes disputed facts or legal conclusions,
7 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
8 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
9 grounds that it is overbroad and seeks information that is neither relevant to any claims or
10 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiver of the foregoing objections, and based on
13 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
14 SDI responds as follows: Denied.

15 **REQUEST FOR ADMISSION NO. 60:**

16 Admit that officers and employees of Samsung SDI engaged in discussions
17 and attended meetings with at least one of the Toshiba Companies during the Relevant
18 Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 60:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
23 without limitation as to the purportedly defined term “discussions and [] meetings” as used
24 in this request. SDI also objects to this request to the extent it seeks information in the
25 possession, custody or control of Plaintiffs, or that are equally or more readily available to
26 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
27 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
28 purports to require SDI to draw legal conclusions, and SDI hereby denies any such

1 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
2 is overbroad and seeks information that is neither relevant to any claims or defenses in this
3 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiver of the foregoing objections, and based on
5 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
6 SDI responds as follows: Denied.

7 **REQUEST FOR ADMISSION NO. 61:**

8 Admit that officers and employees of Samsung SDI exchanged CDT pricing
9 information with at least one of the Toshiba Companies during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the term "pricing information" as used in this request. SDI also
15 objects to this request to the extent it seeks information in the possession, custody or
16 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
17 defendants, third parties or otherwise. SDI further objects to this request to the extent it
18 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
19 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
20 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
21 information that is neither relevant to any claims or defenses in this litigation nor
22 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
23 to this request on the grounds that it is duplicative and unreasonably cumulative of other
24 discovery propounded and responded to in this multi-district litigation, in violation of
25 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
26 Management Protocol, and is therefore unduly burdensome and oppressive.

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1 **REQUEST FOR ADMISSION NO. 62:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to fix prices of CDTs with at least one of the Toshiba Companies during the
4 Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
10 also objects to this request to the extent it seeks information in the possession, custody or
11 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
12 defendants, third parties or otherwise. SDI further objects to this request to the extent it
13 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
14 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
15 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
16 information that is neither relevant to any claims or defenses in this litigation nor
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiver of the foregoing objections, and based on
19 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
20 SDI responds as follows: Denied.

21 **REQUEST FOR ADMISSION NO. 63:**

22 Admit that officers and employees of Samsung SDI participated in a
23 conspiracy to reduce output of CDTs with at least one of the Toshiba Companies during
24 the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 64:**

14 Admit that officers and employees of Samsung SDI participated in a
15 conspiracy to allocate market shares of CDTs with at least one of the Toshiba Companies
16 during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
22 also objects to this request to the extent it seeks information in the possession, custody or
23 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
24 defendants, third parties or otherwise. SDI further objects to this request to the extent it
25 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
26 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
27 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
28

1 information that is neither relevant to any claims or defenses in this litigation nor
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 65:**

7 Admit that during discussions and meetings with at least one of the Toshiba
8 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
9 CDTs during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the purportedly defined term "discussions and meetings" and the
15 term "agreements" as used in this request. SDI also objects to this request to the extent it
16 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
17 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
18 further objects to this request to the extent it assumes disputed facts or legal conclusions,
19 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
20 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
21 grounds that it is overbroad and seeks information that is neither relevant to any claims or
22 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 66:**

2 Admit that during discussions and meetings with at least one of the Toshiba
3 Companies, officers and employees of Samsung SDI reached agreements to reduce output
4 of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term "discussions and meetings" and the
10 term "agreements" as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 67:**

23 Admit that during discussions and meetings with at least one of the Toshiba
24 Companies, officers and employees of Samsung SDI reached agreements to allocate
25 market shares of CDTs during the Relevant Period.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

27 In addition to its General Objections and Objections to Certain Instructions
28 and Definitions, each of which is incorporated by this reference as though fully set forth

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the purportedly defined term “discussions and meetings” and the
3 term “agreements” as used in this request. SDI also objects to this request to the extent it
4 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
5 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
6 further objects to this request to the extent it assumes disputed facts or legal conclusions,
7 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
8 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
9 grounds that it is overbroad and seeks information that is neither relevant to any claims or
10 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiver of the foregoing objections, and based on
13 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
14 SDI responds as follows: Denied.

15 **REQUEST FOR ADMISSION NO. 68:**

16 Admit that officers and employees of Samsung SDI engaged in discussions
17 and attended meetings with at least one of the Chunghwa Companies during the Relevant
18 Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request to the extent it seeks information in the possession,
23 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
24 from other defendants, third parties or otherwise. SDI further objects to this request to the
25 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
26 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
27 legal conclusions. SDI also objects to this request on the grounds that it is vague and
28 ambiguous, overbroad, and seeks information that is neither relevant to any claims or

1 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: SDI admits that it engaged in discussions and attended meetings
6 as described in its Plea Agreement with individuals who SDI understood to be
7 representatives of at least one Chunghwa entity.

8 **REQUEST FOR ADMISSION NO. 69:**

9 Admit that officers and employees of Samsung SDI exchanged CDT pricing
10 information with at least one of the Chunghwa Companies during the Relevant Period.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

12 In addition to its General Objections and Objections to Certain Instructions
13 and Definitions, each of which is incorporated by this reference as though fully set forth
14 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
15 without limitation as to the term "pricing information" as used in this request. SDI also
16 objects to this request to the extent it seeks information in the possession, custody or
17 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
18 defendants, third parties or otherwise. SDI further objects to this request to the extent it
19 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
20 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
21 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
22 information that is neither relevant to any claims or defenses in this litigation nor
23 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
24 to this request on the grounds that it is duplicative and unreasonably cumulative of other
25 discovery propounded and responded to in this multi-district litigation, in violation of
26 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
27 Management Protocol, and is therefore unduly burdensome and oppressive.

28

1 **REQUEST FOR ADMISSION NO. 70:**

2 Admit that during discussions and meetings with at least one of the
3 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to fix
4 prices of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request to the extent it seeks information in the possession,
9 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
10 from other defendants, third parties or otherwise. SDI further objects to this request to the
11 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
12 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
13 legal conclusions. SDI also objects to this request on the grounds that it is vague and
14 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
15 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiver of the foregoing objections, and based on
18 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
19 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
20 in its Plea Agreement with at least one Chunghwa entity.

21 **REQUEST FOR ADMISSION NO. 71:**

22 Admit that during discussions and meetings with at least one of the
23 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to
24 reduce output of CDTs during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request to the extent it seeks information in the possession,

1 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
2 from other defendants, third parties or otherwise. SDI further objects to this request to the
3 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
4 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
5 legal conclusions. SDI also objects to this request on the grounds that it is vague and
6 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
7 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiver of the foregoing objections, and based on
10 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
11 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
12 in its Plea Agreement with at least one Chunghwa entity.

13 **REQUEST FOR ADMISSION NO. 72:**

14 Admit that during discussions and meetings with at least one of the
15 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to
16 allocate market shares of CDTs during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request to the extent it seeks information in the possession,
21 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
22 from other defendants, third parties or otherwise. SDI further objects to this request to the
23 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
24 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
25 legal conclusions. SDI also objects to this request on the grounds that it is vague and
26 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
27 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
4 in its Plea Agreement with at least one Chunghwa entity.

5 **REQUEST FOR ADMISSION NO. 73:**

6 Admit that officers and employees of Samsung SDI participated in a
7 conspiracy to fix prices of CDTs with at least one of the Chunghwa Companies during the
8 Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request to the extent it seeks information in the possession,
13 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
14 from other defendants, third parties or otherwise. SDI further objects to this request to the
15 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
16 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
17 legal conclusions. SDI also objects to this request on the grounds that it is vague and
18 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
19 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiver of the foregoing objections, and based on
22 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
23 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
24 in its Plea Agreement with at least one Chunghwa entity.

25 **REQUEST FOR ADMISSION NO. 74:**

26 Admit that officers and employees of Samsung SDI participated in a
27 conspiracy to reduce output of CDTs with at least one of the Chunghwa Companies during
28 the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 74:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is vague and ambiguous, overbroad, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI's present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: SDI admits that it participated in the CDT conspiracy described in its Plea Agreement with at least one Chunghwa entity.

REQUEST FOR ADMISSION NO. 75:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the Chunghwa Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 75:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or

1 legal conclusions. SDI also objects to this request on the grounds that it is vague and
2 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
8 in its Plea Agreement with at least one Chunghwa entity.

9 **REQUEST FOR ADMISSION NO. 76:**

10 Admit that officers and employees of Samsung SDI engaged in discussions
11 and attended meetings with at least one of the Orion Companies during the Relevant
12 Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and [] meetings" as used
18 in this request. SDI also objects to this request to the extent it seeks information in the
19 possession, custody or control of Plaintiffs, or that are equally or more readily available to
20 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
21 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
22 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
23 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
24 is overbroad and seeks information that is neither relevant to any claims or defenses in this
25 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Subject to and without waiver of the foregoing objections, and based on
27 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
28 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 77:**

2 Admit that officers and employees of Samsung SDI exchanged CDT pricing
3 information with at least one of the Orion Companies during the Relevant Period.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 77:**

5 In addition to its General Objections and Objections to Certain Instructions
6 and Definitions, each of which is incorporated by this reference as though fully set forth
7 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
8 without limitation as to the term "pricing information" as used in this request. SDI also
9 objects to this request to the extent it seeks information in the possession, custody or
10 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
11 defendants, third parties or otherwise. SDI further objects to this request to the extent it
12 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
13 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
14 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
15 information that is neither relevant to any claims or defenses in this litigation nor
16 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
17 to this request on the grounds that it is duplicative and unreasonably cumulative of other
18 discovery propounded and responded to in this multi-district litigation, in violation of
19 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
20 Management Protocol, and is therefore unduly burdensome and oppressive.

21 **REQUEST FOR ADMISSION NO. 78:**

22 Admit that officers and employees of Samsung SDI participated in a
23 conspiracy to fix prices of CDTs with at least one of the Orion Companies during the
24 Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 78:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 79:**

14 Admit that officers and employees of Samsung SDI participated in a
15 conspiracy to reduce output of CDTs with at least one of the Orion Companies during the
16 Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 79:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
22 also objects to this request to the extent it seeks information in the possession, custody or
23 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
24 defendants, third parties or otherwise. SDI further objects to this request to the extent it
25 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
26 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
27 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
28

1 information that is neither relevant to any claims or defenses in this litigation nor
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: Denied.

6 **REQUEST FOR ADMISSION NO. 80:**

7 Admit that officers and employees of Samsung SDI participated in a
8 conspiracy to allocate market shares of CDTs with at least one of the Orion Companies
9 during the Relevant Period.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

11 In addition to its General Objections and Objections to Certain Instructions
12 and Definitions, each of which is incorporated by this reference as though fully set forth
13 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
14 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
15 also objects to this request to the extent it seeks information in the possession, custody or
16 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
17 defendants, third parties or otherwise. SDI further objects to this request to the extent it
18 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
19 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
20 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
21 information that is neither relevant to any claims or defenses in this litigation nor
22 reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiver of the foregoing objections, and based on
24 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
25 SDI responds as follows: Denied.

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1 **REQUEST FOR ADMISSION NO. 81:**

2 Admit that during discussions and meetings with at least one of the Orion
3 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
4 CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 81:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term "discussions and meetings" and the
10 term "agreements" as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 82:**

23 Admit that during discussions and meetings with at least one of the Orion
24 Companies, officers and employees of Samsung SDI reached agreements to reduce output
25 of CDTs during the Relevant Period.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 82:**

27 In addition to its General Objections and Objections to Certain Instructions
28 and Definitions, each of which is incorporated by this reference as though fully set forth

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the purportedly defined term “discussions and meetings” and the
3 term “agreements” as used in this request. SDI also objects to this request to the extent it
4 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
5 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
6 further objects to this request to the extent it assumes disputed facts or legal conclusions,
7 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
8 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
9 grounds that it is overbroad and seeks information that is neither relevant to any claims or
10 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiver of the foregoing objections, and based on
13 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
14 SDI responds as follows: Denied.

15 **REQUEST FOR ADMISSION NO. 83:**

16 Admit that during discussions and meetings with at least one of the Orion
17 Companies, officers and employees of Samsung SDI reached agreements to allocate
18 market shares of CDTs during the Relevant Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 83:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
23 without limitation as to the purportedly defined term “discussions and meetings” and the
24 term “agreements” as used in this request. SDI also objects to this request to the extent it
25 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
26 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
27 further objects to this request to the extent it assumes disputed facts or legal conclusions,
28 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby

1 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
2 grounds that it is overbroad and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: Denied.

8 **REQUEST FOR ADMISSION NO. 84:**

9 Admit that officers and employees of Samsung SDI engaged in discussions
10 and attended meetings with Samtel Color, Ltd. during the Relevant Period.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 84:**

12 In addition to its General Objections and Objections to Certain Instructions
13 and Definitions, each of which is incorporated by this reference as though fully set forth
14 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
15 without limitation as to the purportedly defined term "discussions and [] meetings" as used
16 in this request. SDI also objects to this request to the extent it seeks information in the
17 possession, custody or control of Plaintiffs, or that are equally or more readily available to
18 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
19 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
20 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
21 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
22 is overbroad and seeks information that is neither relevant to any claims or defenses in this
23 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiver of the foregoing objections, and based on
25 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
26 SDI responds as follows: Denied.

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1 **REQUEST FOR ADMISSION NO. 85:**

2 Admit that officers and employees of Samsung SDI exchanged CDT pricing
3 information with Samtel Color, Ltd. during the Relevant Period.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 85:**

5 In addition to its General Objections and Objections to Certain Instructions
6 and Definitions, each of which is incorporated by this reference as though fully set forth
7 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
8 without limitation as to the term "pricing information" as used in this request. SDI also
9 objects to this request to the extent it seeks information in the possession, custody or
10 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
11 defendants, third parties or otherwise. SDI further objects to this request to the extent it
12 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
13 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
14 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
15 information that is neither relevant to any claims or defenses in this litigation nor
16 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
17 to this request on the grounds that it is duplicative and unreasonably cumulative of other
18 discovery propounded and responded to in this multi-district litigation, in violation of
19 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
20 Management Protocol, and is therefore unduly burdensome and oppressive.

21 **REQUEST FOR ADMISSION NO. 86:**

22 Admit that during discussions and meetings with Samtel Color, Ltd., officers
23 and employees of Samsung SDI reached agreements to fix prices of CDTs during the
24 Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 86:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the purportedly defined term “discussions and meetings” and the
2 term “agreements” as used in this request. SDI also objects to this request to the extent it
3 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
4 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
5 further objects to this request to the extent it assumes disputed facts or legal conclusions,
6 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
7 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
8 grounds that it is overbroad and seeks information that is neither relevant to any claims or
9 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without waiver of the foregoing objections, and based on
12 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
13 SDI responds as follows: Denied.

14 **REQUEST FOR ADMISSION NO. 87:**

15 Admit that during discussions and meetings with Samtel Color, Ltd., officers
16 and employees of Samsung SDI reached agreements to reduce output of CDTs during the
17 Relevant Period.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 87:**

19 In addition to its General Objections and Objections to Certain Instructions
20 and Definitions, each of which is incorporated by this reference as though fully set forth
21 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
22 without limitation as to the purportedly defined term “discussions and meetings” and the
23 term “agreements” as used in this request. SDI also objects to this request to the extent it
24 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
25 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
26 further objects to this request to the extent it assumes disputed facts or legal conclusions,
27 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
28 denies any such disputed facts or legal conclusions. SDI also objects to this request on the

1 grounds that it is overbroad and seeks information that is neither relevant to any claims or
2 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Subject to and without waiver of the foregoing objections, and based on
5 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
6 SDI responds as follows: Denied.

7 **REQUEST FOR ADMISSION NO. 88:**

8 Admit that during discussions and meetings with Samtel Color, Ltd., officers
9 and employees of Samsung SDI reached agreements to allocate market shares of CDTs
10 during the Relevant Period.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 88:**

12 In addition to its General Objections and Objections to Certain Instructions
13 and Definitions, each of which is incorporated by this reference as though fully set forth
14 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
15 without limitation as to the purportedly defined term "discussions and meetings" and the
16 term "agreements" as used in this request. SDI also objects to this request to the extent it
17 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
18 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
19 further objects to this request to the extent it assumes disputed facts or legal conclusions,
20 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
21 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
22 grounds that it is overbroad and seeks information that is neither relevant to any claims or
23 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Subject to and without waiver of the foregoing objections, and based on
26 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
27 SDI responds as follows: Denied.

28

1 **REQUEST FOR ADMISSION NO. 89:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to fix prices of CDTs with Samtel Color, Ltd. during the Relevant Period.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 89:**

5 In addition to its General Objections and Objections to Certain Instructions
6 and Definitions, each of which is incorporated by this reference as though fully set forth
7 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
8 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
9 also objects to this request to the extent it seeks information in the possession, custody or
10 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
11 defendants, third parties or otherwise. SDI further objects to this request to the extent it
12 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
13 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
14 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
15 information that is neither relevant to any claims or defenses in this litigation nor
16 reasonably calculated to lead to the discovery of admissible evidence.

17 Subject to and without waiver of the foregoing objections, and based on
18 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
19 SDI responds as follows: Denied.

20 **REQUEST FOR ADMISSION NO. 90:**

21 Admit that officers and employees of Samsung SDI participated in a
22 conspiracy to reduce output of CDTs with Samtel Color, Ltd. during the Relevant Period.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 90:**

24 In addition to its General Objections and Objections to Certain Instructions
25 and Definitions, each of which is incorporated by this reference as though fully set forth
26 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
27 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
28 also objects to this request to the extent it seeks information in the possession, custody or

1 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
2 defendants, third parties or otherwise. SDI further objects to this request to the extent it
3 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
4 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
5 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
6 information that is neither relevant to any claims or defenses in this litigation nor
7 reasonably calculated to lead to the discovery of admissible evidence.

8 Subject to and without waiver of the foregoing objections, and based on
9 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
10 SDI responds as follows: Denied.

11 **REQUEST FOR ADMISSION NO. 91:**

12 Admit that officers and employees of Samsung SDI participated in a
13 conspiracy to allocate market shares of CDTs with Samtel Color, Ltd. during the Relevant
14 Period.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 91:**

16 In addition to its General Objections and Objections to Certain Instructions
17 and Definitions, each of which is incorporated by this reference as though fully set forth
18 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
19 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
20 also objects to this request to the extent it seeks information in the possession, custody or
21 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
22 defendants, third parties or otherwise. SDI further objects to this request to the extent it
23 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
24 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
25 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
26 information that is neither relevant to any claims or defenses in this litigation nor
27 reasonably calculated to lead to the discovery of admissible evidence.

28

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 92:**

5 Admit that officers and employees of Samsung SDI engaged in discussions
6 and attended meetings with Thai CRT Co. during the Relevant Period.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 92:**

8 In addition to its General Objections and Objections to Certain Instructions
9 and Definitions, each of which is incorporated by this reference as though fully set forth
10 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
11 without limitation as to the purportedly defined term "discussions and [] meetings" as used
12 in this request. SDI also objects to this request to the extent it seeks information in the
13 possession, custody or control of Plaintiffs, or that are equally or more readily available to
14 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
15 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
16 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
17 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
18 is overbroad and seeks information that is neither relevant to any claims or defenses in this
19 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiver of the foregoing objections, and based on
21 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
22 SDI responds as follows: Denied.

23 **REQUEST FOR ADMISSION NO. 93:**

24 Admit that officers and employees of Samsung SDI exchanged CDT pricing
25 information with Thai CRT Co. during the Relevant Period.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 93:**

27 In addition to its General Objections and Objections to Certain Instructions
28 and Definitions, each of which is incorporated by this reference as though fully set forth

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the term “pricing information” as used in this request. SDI also
3 objects to this request to the extent it seeks information in the possession, custody or
4 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
5 defendants, third parties or otherwise. SDI further objects to this request to the extent it
6 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
7 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
8 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
9 information that is neither relevant to any claims or defenses in this litigation nor
10 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
11 to this request on the grounds that it is duplicative and unreasonably cumulative of other
12 discovery propounded and responded to in this multi-district litigation, in violation of
13 Section X.V., par. C-F, of the Court’s April 3, 2012 Order re Discovery and Case
14 Management Protocol, and is therefore unduly burdensome and oppressive.

15 **REQUEST FOR ADMISSION NO. 94:**

16 Admit that during discussions and meetings with Thai CRT Co., officers and
17 employees of Samsung SDI reached agreements to fix prices of CDTs during the Relevant
18 Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 94:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
23 without limitation as to the purportedly defined term “discussions and meetings” and the
24 term “agreements” as used in this request. SDI also objects to this request to the extent it
25 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
26 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
27 further objects to this request to the extent it assumes disputed facts or legal conclusions,
28 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby

1 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
2 grounds that it is overbroad and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: Denied.

8 **REQUEST FOR ADMISSION NO. 95:**

9 Admit that during discussions and meetings with Thai CRT Co., officers and
10 employees of Samsung SDI reached agreements to reduce output of CDTs during the
11 Relevant Period.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 95:**

13 In addition to its General Objections and Objections to Certain Instructions
14 and Definitions, each of which is incorporated by this reference as though fully set forth
15 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
16 without limitation as to the purportedly defined term "discussions and meetings" and the
17 term "agreements" as used in this request. SDI also objects to this request to the extent it
18 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
19 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
20 further objects to this request to the extent it assumes disputed facts or legal conclusions,
21 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
22 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
23 grounds that it is overbroad and seeks information that is neither relevant to any claims or
24 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to and without waiver of the foregoing objections, and based on
27 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
28 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 96:**

2 Admit that during discussions and meetings with Thai CRT Co., officers and
3 employees of Samsung SDI reached agreements to allocate market shares of CDTs during
4 the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 96:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the purportedly defined term "discussions and meetings" and the
10 term "agreements" as used in this request. SDI also objects to this request to the extent it
11 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
12 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
13 further objects to this request to the extent it assumes disputed facts or legal conclusions,
14 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
15 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
16 grounds that it is overbroad and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: Denied.

22 **REQUEST FOR ADMISSION NO. 97:**

23 Admit that officers and employees of Samsung SDI participated in a
24 conspiracy to fix prices of CDTs with Thai CRT Co. during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 97:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
2 also objects to this request to the extent it seeks information in the possession, custody or
3 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
4 defendants, third parties or otherwise. SDI further objects to this request to the extent it
5 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
6 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
7 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
8 information that is neither relevant to any claims or defenses in this litigation nor
9 reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 98:**

14 Admit that officers and employees of Samsung SDI participated in a
15 conspiracy to reduce output of CDTs with Thai CRT Co. during the Relevant Period.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 98:**

17 In addition to its General Objections and Objections to Certain Instructions
18 and Definitions, each of which is incorporated by this reference as though fully set forth
19 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
20 without limitation as to the term “participated in a conspiracy” as used in this request. SDI
21 also objects to this request to the extent it seeks information in the possession, custody or
22 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
23 defendants, third parties or otherwise. SDI further objects to this request to the extent it
24 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
25 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
26 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
27 information that is neither relevant to any claims or defenses in this litigation nor
28 reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 99:**

5 Admit that officers and employees of Samsung SDI participated in a
6 conspiracy to allocate market shares of CDTs with Thai CRT Co. during the Relevant
7 Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 99:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
13 also objects to this request to the extent it seeks information in the possession, custody or
14 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
15 defendants, third parties or otherwise. SDI further objects to this request to the extent it
16 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
17 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
18 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
19 information that is neither relevant to any claims or defenses in this litigation nor
20 reasonably calculated to lead to the discovery of admissible evidence.

21 Subject to and without waiver of the foregoing objections, and based on
22 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
23 SDI responds as follows: Denied.

24 **REQUEST FOR ADMISSION NO. 100:**

25 Admit that officers and employees of Samsung SDI engaged in discussions
26 and attended meetings with LP Displays Int'l, Ltd. during the Relevant Period.
27
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 100:**

2 In addition to its General Objections and Objections to Certain Instructions
3 and Definitions, each of which is incorporated by this reference as though fully set forth
4 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
5 without limitation as to the purportedly defined term “discussions and [] meetings” as used
6 in this request. SDI also objects to this request to the extent it seeks information in the
7 possession, custody or control of Plaintiffs, or that are equally or more readily available to
8 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
9 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
10 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
11 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
12 is overbroad and seeks information that is neither relevant to any claims or defenses in this
13 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

14 Subject to and without waiver of the foregoing objections, and based on
15 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
16 SDI responds as follows: Denied.

17 **REQUEST FOR ADMISSION NO. 101:**

18 Admit that officers and employees of Samsung SDI exchanged CDT pricing
19 information with LP Displays Int’l, Ltd. during the Relevant Period.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 101:**

21 In addition to its General Objections and Objections to Certain Instructions
22 and Definitions, each of which is incorporated by this reference as though fully set forth
23 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
24 without limitation as to the term “pricing information” as used in this request. SDI also
25 objects to this request to the extent it seeks information in the possession, custody or
26 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
27 defendants, third parties or otherwise. SDI further objects to this request to the extent it
28 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI

1 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
2 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
3 information that is neither relevant to any claims or defenses in this litigation nor
4 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
5 to this request on the grounds that it is duplicative and unreasonably cumulative of other
6 discovery propounded and responded to in this multi-district litigation, in violation of
7 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
8 Management Protocol, and is therefore unduly burdensome and oppressive.

9 **REQUEST FOR ADMISSION NO. 102:**

10 Admit that during discussions and meetings with LP Displays Int'l, Ltd.,
11 officers and employees of Samsung SDI reached agreements to fix prices of CDTs during
12 the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 102:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and meetings" and the
18 term "agreements" as used in this request. SDI also objects to this request to the extent it
19 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
20 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
21 further objects to this request to the extent it assumes disputed facts or legal conclusions,
22 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
23 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
24 grounds that it is overbroad and seeks information that is neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 103:**

5 Admit that during discussions and meetings with LP Displays Int'l, Ltd.,
6 officers and employees of Samsung SDI reached agreements to reduce output of CDTs
7 during the Relevant Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 103:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the purportedly defined term "discussions and meetings" and the
13 term "agreements" as used in this request. SDI also objects to this request to the extent it
14 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
15 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
16 further objects to this request to the extent it assumes disputed facts or legal conclusions,
17 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
18 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
19 grounds that it is overbroad and seeks information that is neither relevant to any claims or
20 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 104:**

26 Admit that during discussions and meetings with LP Displays Int'l, Ltd.,
27 officers and employees of Samsung SDI reached agreements to allocate market shares of
28 CDTs during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 104:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and meetings” and the term “agreements” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 105:

Admit that officers and employees of Samsung SDI participated in a conspiracy to fix prices of CDTs with LP Displays Int’l, Ltd. during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 105:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it

1 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
2 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
3 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
4 information that is neither relevant to any claims or defenses in this litigation nor
5 reasonably calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: Denied.

9 **REQUEST FOR ADMISSION NO. 106:**

10 Admit that officers and employees of Samsung SDI participated in a
11 conspiracy to reduce output of CDTs with LP Displays Int'l, Ltd. during the Relevant
12 Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 106:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
18 also objects to this request to the extent it seeks information in the possession, custody or
19 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
20 defendants, third parties or otherwise. SDI further objects to this request to the extent it
21 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
22 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
23 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
24 information that is neither relevant to any claims or defenses in this litigation nor
25 reasonably calculated to lead to the discovery of admissible evidence.

26 Subject to and without waiver of the foregoing objections, and based on
27 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
28 SDI responds as follows: Denied.

1 **REQUEST FOR ADMISSION NO. 107:**

2 Admit that officers and employees of Samsung SDI participated in a
3 conspiracy to allocate market shares of CDTs with LP Displays Int'l, Ltd. during the
4 Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 107:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
9 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
10 also objects to this request to the extent it seeks information in the possession, custody or
11 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
12 defendants, third parties or otherwise. SDI further objects to this request to the extent it
13 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
14 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
15 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
16 information that is neither relevant to any claims or defenses in this litigation nor
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiver of the foregoing objections, and based on
19 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
20 SDI responds as follows: Denied.

21 **REQUEST FOR ADMISSION NO. 108:**

22 Admit that officers and employees of Samsung SDI engaged in discussions
23 and attended meetings with P.T. Tosummit Electronic Devices Indonesia during the
24 Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 108:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including

1 without limitation as to the purportedly defined term “discussions and [] meetings” as used
2 in this request. SDI also objects to this request to the extent it seeks information in the
3 possession, custody or control of Plaintiffs, or that are equally or more readily available to
4 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
5 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
6 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
7 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
8 is overbroad and seeks information that is neither relevant to any claims or defenses in this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiver of the foregoing objections, and based on
11 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
12 SDI responds as follows: Denied.

13 **REQUEST FOR ADMISSION NO. 109:**

14 Admit that officers and employees of Samsung SDI exchanged CDT pricing
15 information with P.T. Tosummit Electronic Devices Indonesia during the Relevant Period.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 109:**

17 In addition to its General Objections and Objections to Certain Instructions
18 and Definitions, each of which is incorporated by this reference as though fully set forth
19 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
20 without limitation as to the term “pricing information” as used in this request. SDI also
21 objects to this request to the extent it seeks information in the possession, custody or
22 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
23 defendants, third parties or otherwise. SDI further objects to this request to the extent it
24 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
25 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
26 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
27 information that is neither relevant to any claims or defenses in this litigation nor
28 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects

1 to this request on the grounds that it is duplicative and unreasonably cumulative of other
2 discovery propounded and responded to in this multi-district litigation, in violation of
3 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
4 Management Protocol, and is therefore unduly burdensome and oppressive.

5 **REQUEST FOR ADMISSION NO. 110:**

6 Admit that officers and employees of Samsung SDI participated in a
7 conspiracy to fix prices of CDTs with P.T. Tosummit Electronic Devices Indonesia during
8 the Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 110:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
13 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
14 also objects to this request to the extent it seeks information in the possession, custody or
15 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
16 defendants, third parties or otherwise. SDI further objects to this request to the extent it
17 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
18 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
19 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
20 information that is neither relevant to any claims or defenses in this litigation nor
21 reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 111:**

26 Admit that officers and employees of Samsung SDI participated in a
27 conspiracy to reduce output of CDTs with P.T. Tosummit Electronic Devices Indonesia
28 during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 111:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 112:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with P.T. Tosummit Electronic Devices Indonesia during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 112:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it

1 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
2 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
3 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
4 information that is neither relevant to any claims or defenses in this litigation nor
5 reasonably calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: Denied.

9 **REQUEST FOR ADMISSION NO. 113:**

10 Admit that during discussions and meetings with P.T. Tosummit Electronic
11 Devices Indonesia, officers and employees of Samsung SDI reached agreements to fix
12 prices of CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 113:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and meetings" and the
18 term "agreements" as used in this request. SDI also objects to this request to the extent it
19 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
20 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
21 further objects to this request to the extent it assumes disputed facts or legal conclusions,
22 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
23 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
24 grounds that it is overbroad and seeks information that is neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 114:**

5 Admit that during discussions and meetings with P.T. Tosummit Electronic
6 Devices Indonesia, officers and employees of Samsung SDI reached agreements to reduce
7 output of CDTs during the Relevant Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 114:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the purportedly defined term "discussions and meetings" and the
13 term "agreements" as used in this request. SDI also objects to this request to the extent it
14 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
15 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
16 further objects to this request to the extent it assumes disputed facts or legal conclusions,
17 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
18 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
19 grounds that it is overbroad and seeks information that is neither relevant to any claims or
20 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 115:**

26 Admit that during discussions and meetings with P.T. Tosummit Electronic
27 Devices Indonesia, officers and employees of Samsung SDI reached agreements to allocate
28 market shares of CDTs during the Relevant Period.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 115:**

2 In addition to its General Objections and Objections to Certain Instructions
3 and Definitions, each of which is incorporated by this reference as though fully set forth
4 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
5 without limitation as to the purportedly defined term "discussions and meetings" and the
6 term "agreements" as used in this request. SDI also objects to this request to the extent it
7 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
8 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
9 further objects to this request to the extent it assumes disputed facts or legal conclusions,
10 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
11 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
12 grounds that it is overbroad and seeks information that is neither relevant to any claims or
13 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
14 evidence.

15 Subject to and without waiver of the foregoing objections, and based on
16 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
17 SDI responds as follows: Denied.

18
19 Dated: November 25, 2013

20 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

21
22 By /s/ Michael W. Scarborough
23 MICHAEL W. SCARBOROUGH

24 Attorneys for Defendant
25 SAMSUNG SDI CO., LTD.
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